

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-H and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: October 31, 2018

EXHIBIT A – AYLSTOCK WITKIN KREIS & OVERHOLTZ

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-06065	Sharon Mashburn v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.,
2:13-CV-25668	Diana Krzeminski, Stanley Krzeminski v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.,
2:14-CV-08383	Stephanie L. Seese, Thomas Seese v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – CAREY DANIS & LOWE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-13306	Linda Crocker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

EXHIBIT C – FIBICH LEEBRON COPELAND BRIGGS JOSEPHSON

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-15771	Donna Gambill, Vernon Russel Gambill v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D – HAMILTON LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-26615	Lucille Elms v. Johnson & Johnson, Ethicon, Inc., American Medical Systems, Inc.

EXHIBIT E – HEARD ROBINS CLOUD & BLACK

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-11098	Lisa Ann Shank, Meade Shank v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – KLINE & SPECTER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-04837	Linda Joyce Jarrett, James Jarrett v., American Medical Systems, Inc.

EXHIBIT G – WILLIAMS KHERKHER HART BOUNDAS

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-09814	Carole Watkins, Robert William Watkins v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT H – WRIGHT & SCHULTE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-07776	Ellen M. Salas v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Stephen J. McConnell